

**ORIGINAL**  
**UNITED STATES DISTRICT COURT**  
**FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**BARBARA A. WILHELM,**  
**Plaintiff**

**v.**

**COMMONWEALTH OF PA.;**  
**PENNSYLVANIA STATE POLICE;**  
  
**Defendants**

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: **NO. 1:CV-01-1057**  
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: **(JUDGE RAMBO)**  
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**FILED**  
**HARRISBURG, PA.**  
**JUN 18 2003**

**MARY E. D'ANDREA**  
Per \_\_\_\_\_  
Deputy Clerk

**PLAINTIFF'S UNCONTESTED MOTION FOR AN**  
**ENLARGEMENT OF TIME TO FILE REPLY MEMORANDUM IN**  
**SUPPORT OF PETITION FOR ATTORNEY'S FEES AND COSTS**

Pursuant to Fed.R.Civ.P. 6(b), plaintiff, Barbara A. Wilhelm, by and through her attorney, Nathan C. Pringle, Jr., respectfully requests an enlargement of time of three days, to and including June 27, 2003, to file plaintiff's reply memorandum in support of petition for attorney's fees and costs, and in support thereof, sets forth the following:

1. On June 9, 2003, defendants filed a memorandum in opposition to plaintiff's petition for attorney's fees and costs.
2. Plaintiff's reply memorandum in support of the petition of attorney's fees and costs is due on June 23, 2003.

3. Plaintiff's counsel's current workload has made difficult to provide an adequate response to defendants' memorandum, which is 35 pages in length, and includes hundreds of pages of supporting documentation.
4. A delay of four days in filing the memorandum will not prejudice the rights of the defendants.
5. Counsel for plaintiff has contacted defendants' counsel, Susan J. Forney, who has no objection.

**WHEREFORE**, the plaintiff, Barbara A. Wilhelm, respectfully requests an enlargement of time of four days, to and including June 27, 2003, to file a reply brief in support of petition for attorney's fees and costs.

Respectfully Submitted,



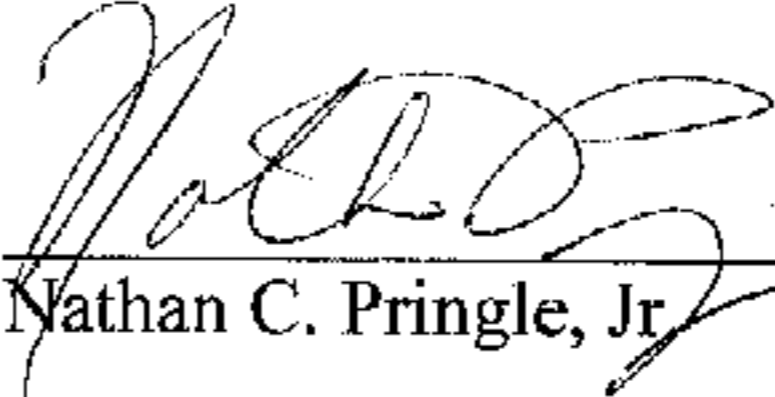
Nathan C. Pringle, Jr.  
Attorney I. D. Number 30142  
3601 North Progress Avenue  
Suite 200  
Harrisburg, PA 17110  
(717) 909-8520  
Attorney for Plaintiff

June 19, 2003

**CERTIFICATE OF SERVICE**

I, Nathan C. Pringle, Jr., hereby certify that on June 19, 200, I caused to be delivered by first class mail a copy of the foregoing document entitled Plaintiff's Uncontested Motion for an Enlargement of Time to File Reply Memorandum in Support of Petition for Attorney's Fees and Cost upon the following:

Susan J. Forney  
Chief Deputy Attorney General  
Office of Attorney General  
Litigation Section  
15<sup>th</sup> Floor, Strawberry Square  
Harrisburg, PA 17120

  
\_\_\_\_\_  
Nathan C. Pringle, Jr.

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**BARBARA A. WILHELM,**  
**Plaintiff**

**v.**

**COMMONWEALTH OF PA.;**  
**PENNSYLVANIA STATE POLICE;**  
**COLONEL PAUL J. EVANKO,**  
**COMMISSIONER; LIEUTENANT**  
**COLONEL THOMAS K. COURY; and**  
**CAPTAIN MICHAEL. D. SIMMERS,**  
**Defendants**

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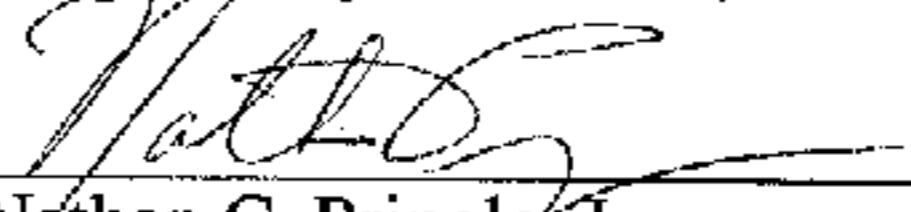
**NO. 1:CV-01-1057**

**(JUDGE RAMBO)**

**CERTIFICATE OF CONCURRENCE**

Nathan C. Pringle, Esquire, counsel for the plaintiff, certified that on June 18, 2003, he spoke with Susan J. Forney, Esquire, counsel for defendants, regarding an enlargement of file a reply memorandum in support of petition for attorney's fees and costs. Ms. Forney has no objection to this request.

Respectfully Submitted,

  
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Nathan C. Pringle, Jr.